

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Richmond Division

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 3:14CR110
)	
ALAN CARL COOLEY,)	
)	
Defendant.)	

STATEMENT OF FACTS

The parties stipulate that the allegations in Count Three of the Superseding Indictment and the following facts are true and correct, and that had the matter gone to trial the United States would have proven them beyond a reasonable doubt.

1. From on or about March 20, 2014, through on or about March 26, 2014, in the Eastern District of Virginia and within the jurisdiction of this Court, defendant, ALAN CARL COOLEY, did knowingly transport an individual, B.M., in interstate and foreign commerce, with the intent that B.M. engage in prostitution and sexual activity for which any person can be charged with a criminal offense.

2. On or about March 23, 2014, COOLEY arranged to pick up B.M. in North Carolina.

3. B.M. and B.W., a minor female, then accompanied COOLEY from North Carolina to Fredericksburg, Virginia, for the purpose of B.M. engaging in prostitution.

4. Upon arriving in Virginia, B.M. rented a hotel room at the Days Inn in Fredericksburg, Virginia, at Cooley's direction with cash that COOLEY provided to her. B.M., B.W., and COOLEY stayed in that room until March 25, 2014.

5. COCLEY used Backpage.com to post an advertisement in the escort section, in which he stated that B.M. would perform sexual acts for money.

6. While staying in Fredericksburg, Virginia, B.M. performed sexual acts for money.

The acts taken by the defendant in furtherance of the offense(s) charged in this case, including the acts described above, were done willfully and knowingly with the specific intent to violate the law.

Respectfully submitted,

Dana J. Boente
United States Attorney

By:




Heather L. Hart
Assistant United States Attorney

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, ALAN CARL COOLEY, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



ALAN CARL COOLEY
Defendant

I am ALAN CARL COOLEY's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.



William Dinkin, Esquire
Attorney for Alan Carl Cooley